OBSERVATION REPORT # 41

Numerous metrics in the New Jersey June, July, August and September 2000 Carrier-to-Carrier Reports deviate from the New Jersey Carrier-to-Carrier Guidelines (May 2000), lacking required data and other elements.

Issue

The New Jersey Carrier-to-Carrier Guidelines (May 2000) outlines the reporting requirements of the Carrier-to Carrier (C2C) Report to be generated by Verizon (VZN) on a monthly basis. KPMG Consulting has found discrepancies between these Guidelines and the June, July, August and September 2000 Carrier-to-Carrier Reports.

The tables below list the metrics that were missing from the Carrier-to-Carrier reports (Table 1), data elements that were missing from the Carrier-to-Carrier reports (Table 2), metric descriptions on Carrier-to-Carrier reports which did not fully match the Carrier-to-Carrier Guidelines (Table 3), metric exclusions in the Carrier-to-Carrier Guidelines that are inconsistent with the metric definitions in those Guidelines (Table 4), metrics that were reported as Under Development (UD) when they should have been available (Table 5), incorrect metric standards on Carrier-to-Carrier reports (Table 6), metric calculations in the Carrier-to-Carrier Guidelines that are inconsistent with the metric definitions in those Guidelines(Table 7), and metric descriptions in the Carrier-to-Carrier Guidelines that are inconsistent with metric titles in those Guidelines (Table 8).

Where relevant, the documents used to assess these observations included: the May 2000 New Jersey Carrier-to-Carrier Guidelines, the June, July, August and September 2000 New Jersey Carrier-to-Carrier Reports and Docket Nos. TX98010010 and TX95120631 (including Appendix A and B).

Table 1: Metrics missing from the June, July, August and September 2000 Carrier-to-Carrier Reports

Domain	Metric	Product	Metric Description	Issue
PR	PR-4-01	UNE - Specials	% Missed Appointment – Total	This metric did not appear on the June, July, August or September Carrier-to-Carrier Reports. Only EEL and IOF metrics were reported.
	PR-4-02	UNE - Specials	Average Delay Days - Total	This metric did not appear on the June, July, August or September Carrier-to-Carrier Reports. Only EEL and IOF metrics were reported.

Domain	Metric	Product	Metric Description	Response
PR	PR-4-01	UNE - Specials	% Missed Appointment – Total	The template was developed incorrectly. Specials were omitted in error. This has been corrected for the October report.
	PR-4-02	UNE - Specials	Average Delay Days – Total	The template was developed incorrectly. Specials were omitted in error. This has been corrected for the October report.

Table 2: Data elements missing from the June, July, August and September 2000 Carrier-to-Carrier Reports

Domain	Metric	Product	Metric Description	Issue
PR	PR-2-13	Retail-POTS	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	The NJ Carrier-to-Carrier Guidelines require disaggregation of "POTS-Residential 2nd Line-Dispatch". The June, July, August and September 2000 C2C reports did not report "POTS-Residential 2nd line".
	PR-3-10	Retail - POTS	% Completed w/in 6 Days (1-5 Lines) (Residential POTS-2nd Line-Dispatch)	The NJ Carrier-to-Carrier Guidelines require disaggregation of "Residential POTS-2nd Line-Dispatch". The June, July, August and September 2000 C2C reports did not report "POTS- Residential 2nd line".
	PR-4-14	Retail – POTS	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch	The NJ Carrier-to-Carrier Guidelines require disaggregation of "Residential POTS-2nd Line-Dispatch". The June, July, August and September 2000 C2C reports did not report "POTS- Residential 2nd line".
	PR-8-01	UNE - Specials	% Open Orders in a Hold Status > 30 Days	UNE Specials were missing from June 2000 C2C report, but were reported on the July, August and September 2000 C2C reports.
	PR-8-02	UNE – Specials	% Open Orders in a Hold Status > 90 Days	UNE Specials were missing from June 2000 C2C report, but were reported on the July, August and September 2000 C2C reports.
PO	PO-4-01	Change Mgmt. Notices/ Confirm.	% Change Management Notices and Change Management Confirmations Sent On-Time – Total (Change Management Notices and Confirmations Combined; Types 1-5 Combined)	Change management confirmation data was not reported on the June, July, August and September 2000 C2C reports.
	PO-4-02	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 1 to 7 days.	Change management confirmation data was not reported on the June, July, August and September 2000 C2C reports.
	PO-4-03	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 8 or more days.	Change management confirmation data was not reported on the June, July, August and September 2000 C2C reports.

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Domain	Metric	Product	Metric Description	Issue
NP	NP-1-02	Retail – BA Common Final Trunks Trunks – BA to CLEC	% Final Trunk Groups Exceeding Blocking Standard – (No Exceptions)- Common and Dedicated	The space for reporting the data in the September 2000 C2C report was blank.
	NP-5-01	Retail	% of Network Outage Notices sent within 30 minutes	Although the standard is Parity w/Retail, on the June, July, August and September 2000 C2C reports there was no Retail data reported.
	NP-6-01	Retail	% of NXX Updates Installed by the LERG Effective Date	According to the NJ C2C Guidelines, this metric is to be measured and reported on a calendar quarterly basis. Although the standard is Parity w/Retail, there was no Retail data reported on the June and September 2000 C2C reports.

Domain	Metric	Product	Metric Description	Issue
PR	PR-2-13	Retail-POTS	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	Per Board Order this metric was not required to be reported until August 2000. As defined by the Guidelines, Retail data reported for this metric is Residential POTS-2nd Line-Dispatch. Data was reported on the August and September reports.
	PR-3-10	Retail - POTS	% Completed w/in 6 Days (1-5 Lines) (Residential POTS-2nd Line-Dispatch)	Per Board Order this metric was not required to be reported until August 2000. As defined by the Guidelines, Retail data reported for this metric is Residential POTS-2nd Line-Dispatch. Data was reported on the August and September reports.

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Domain	Metric	Product	Metric Description	Issue
	PR-4-14	Retail – POTS	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch	Per Board Order this metric was not required to be reported until August 2000. As defined by the Guidelines, Retail data reported for this metric is Residential POTS-2nd Line-Dispatch. Data was reported on the August and September reports.
	PR-8-01	UNE - Specials	% Open Orders in a Hold Status > 30 Days	The template was developed incorrectly. UNE Specials were omitted in error. This has been corrected for the October report.
	PR-8-02	UNE – Specials	% Open Orders in a Hold Status > 90 Days	The template was developed incorrectly. UNE Specials were omitted in error. This has been corrected for the October report.
PO	PO-4-01	Change Mgmt. Notices/ Confirm.	% Change Management Notices and Change Management Confirmations Sent On-Time – Total (Change Management Notices and Confirmations Combined; Types 1-5 Combined)	Verizon misinterpreted the Guideline when developing the template. This metric will be reported for the November data month.
	PO-4-02	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 1 to 7 days.	Verizon misinterpreted the Guideline when developing the template. This metric will be reported for the November data month.
	PO-4-03	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 8 or more days.	Verizon misinterpreted the Guideline when developing the template. This metric will be reported for the November data month.
NP	NP-1-02	Retail – BA Common Final Trunks

Trunks – BA to CLEC | % Final Trunk Groups Exceeding Blocking Standard – (No Exceptions)- Common and Dedicated | Verizon disagrees with this finding. Both Common and Dedicated Trunk values are populated. |
| | NP-5-01 | Retail | % of Network Outage Notices sent within 30 minutes | Verizon developed the template incorrectly. This has been corrected for the October data month. |

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Domain	Metric	Product	Metric Description	Issue
	NP-6-01	Retail	% of NXX Updates Installed by the LERG Effective Date	Verizon mapped incorrectly in June and September. This will be correctly reported in December. The template has been corrected effective with the October report to designate that there are Retail and Wholesale components and that the number is reported quarterly.

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Table 3: Metric descriptions on the Carrier-to-Carrier reports that did not fully match the descriptions in the Carrier-to-Carrier Guidelines.

Domain	Metric	Product	Metric Description	Issue
PR	PR-2-13	UNE– 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.
	PR-2-14	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# and the serial# from the description.
	PR-2-15	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.
	PR-2-16	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.
	PR-2-17	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/o 800#, w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.
	PR-4-14	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.

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Domain	Metric	Product	Metric Description	Issue
	PR-4-15	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# and the serial# from the description.
	PR-4-16	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the 800# from the description.
	PR-4-17	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/ or w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.
	PR-4-18	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/o 800#, w/o serial #)	The description on the C2C reports did not fully match the description in the C2C Guidelines. The June, July, August and September 2000 C2C reports omitted the serial# from the description.

Domain	Metric	Product	Metric Description	Issue
PR	PR-2-13	UNE- 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-2-14	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/DD 2 Test Results, w/800#, w/ or w/o serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-2-15	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.

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Domain	Metric	Product	Metric Description	Issue
	PR-2-16	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/ or w/o serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-2-17	UNE – 2 Wire xDSL	Average Interval Completed – 2 Wire xDSL (w/o DD-2 Test Results, w/o 800#, w/o serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-4-14	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/serial #) (Residential. POTS-2nd Line-Dispatch)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-4-15	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/DD-2 Test Results, w/800#, w/ or w/o serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-4-16	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-4-17	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/800#, w/ or w/o serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.
	PR-4-18	UNE – 2 Wire xDSL	% Completed On Time – 2 Wire xDSL (w/o DD-2 Test Results, w/o 800#, w/o serial #)	Verizon omitted this information from the template because of the length of the description. This was corrected for the October report.

Table 4: Metric exclusions in the Carrier-to-Carrier Guidelines that were inconsistent with the metric definitions in those Carrier-to-Carrier Guidelines.

Domain	Metric	Metric Description	Issue

Domain	Metric	Metric Description	Issue
PR	PR-7	Jeopardy Reports	The wording in the metric exclusion is unclear. Interpreted literally, it is inconsistent with the metric definition. The exclusion should read "Orders that are not complete nor canceled."

Domain	Metric	Metric Description	Issue
PR	PR-7	Jeopardy Reports	Verizon notes KPMG's wish to clarify the Guideline by replacing the word "or" with "nor." The Guideline has been reviewed and approved by the Board. Verizon does not have sole authority to change wording in an approved Guideline.

Table 5: Metrics that were reported as Under Development (UD) in the Carrier-to-Carrier Reports, but should have been available as of August 2000, according to Appendix B of Docket Nos. TX98010010 and TX95120631.

Domain	Metric	Product	Metric Description	Issue
PO	PO-8-01	OSS	% On Time- Manual Loop Qualification	This metric was listed as TBD on the August 2000 C2C report. It was supposed to have been implemented by August 1, 2000 according to Attachment B of NJ PUC Order Dockets # TX95120631 and TX98010010. It was reported UD on the September 2000 C2C report.

Domain	Metric	Product	Metric Description	Issue
	PO-8-02	OSS	% On Time- Engineering Record Request	This metric was listed as TBD on the August 2000 C2C report. It was supposed to have been implemented by August 1, 2000 according to Attachment B of NJ PUC Order Dockets # TX95120631 and TX98010010. It was reported UD on the September 2000 C2C report.

Domain	Metric	Product	Metric Description	Issue
PO	PO-8-01	OSS	% On Time- Manual Loop Qualification	Verizon has initiated the Change Management process for development of the system that this metric will measure. The Change Management process normally requires a CLEC to be the initiator. Since this has not occurred Verizon has assumed that role.
	PO-8-02	OSS	% On Time- Engineering Record Request	Verizon has initiated the Change Management process for development of the system that this metric will measure. The Change Management process normally requires a CLEC to be the initiator. Since this has not occurred Verizon has assumed that role.

Table 6: Incorrect Standards on the June, July, August and September 2000 Carrier-to-Carrier Reports.

Domain	Metric	Product	Metric Description	Issue

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Domain	Metric	Product	Metric Description	Issue
OR	OR-1-08	RESALE - POTS UNE – Loop, Platform	% On Time LSRC < 6 Lines – Fax	Standard should be "95% on time within 24 hours". August, September 2000 C2C reports showed "95% on time within 48 hours".
		RESALE /UNE- 2 Wire Digital, 2 Wire xDSL	% On Time LSRC < 6 Lines – Fax	Standard should be "95% on time within 72 hours". September 2000 C2C report showed "95% on time within 96 hours".
		RESALE /UNE – Specials Non-DSO, DS1, DS3	% On Time LSRC < 6 Lines – Fax	Standard should be "95% on time within 48 hours". August, September 2000 C2C reports showed "95% on time within 72 hours".
	OR-1-10	RESALE – POTS, 2 Wire Digital, 2 Wire xDSL, Specials UNE - Loop, Platform, 2 Wire Digital, 2 Wire xDSL, Specials	% On Time LSRC >/= 6 Lines – Fax	Standard should be "95% on time within 72 hours". August, September 2000 C2C reports showed "95% on time within 96 hours".

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Domain	Metric	Product	Metric Description	Issue
	OR-2-08	RESALE - POTS, 2 Wire Digital, 2 Wire xDSL UNE - Loop, Platform	% On Time LSR Reject < 6 Lines – Fax	Standard should be "95% on time within 24 hours". August, September 2000 C2C reports showed "95% on time within 48 hours".
		RESALE /UNE – 2 Wire Digital, 2 Wire xDSL	% On Time LSR Reject < 6 Lines – Fax	Standard should be "95% on time within 72 hours". September 2000 C2C report showed "95% on time within 96 hours".
		RESALE /UNE - Specials	% On Time LSR Reject < 6 Lines – Fax	Standard should be "95% on time within 48 hours". August, September 2000 C2C reports showed "95% on time within 72 hours".
	OR-2-10	RESALE - POTS, 2 Wire Digital, 2 Wire xDSL, Specials UNE - Loop, Platform, 2 Wire Digital, 2 Wire xDSL, Specials	% On Time LSR Reject >/= 6 Lines – Fax	Standard should be "95% on time within 72 hours". August, September 2000 C2C reports showed "95% on time within 96 hours".

Domain	Metric	Product	Metric Description	Issue

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Domain	Metric	Product	Metric Description	Issue
OR	OR-1-08	RESALE - POTS UNE – Loop, Platform	% On Time LSRC < 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 24 hours plus the additional 24 hours for a total of 48 hours.
		RESALE/UNE-2 Wire Digital, 2 Wire xDSL	% On Time LSRC < 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 72 hours plus the additional 24 hours for a total of 96 hours.
		RESALE/UNE – Specials Non-DSO, DS1, DS3	% On Time LSRC < 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 48 hours plus the additional 24 hours for a total of 72 hours.
	OR-1-10	RESALE – POTS, 2 Wire Digital, 2 Wire xDSL, Specials UNE - Loop, Platform, 2 Wire Digital, 2 Wire xDSL, Specials	% On Time LSRC >/= 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 72 hours plus the additional 24 hours for a total of 96 hours.

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Domain	Metric	Product	Metric Description	Issue
	OR-2-08	RESALE - POTS, 2 Wire Digital, 2 Wire xDSL UNE - Loop, Platform	% On Time LSR Reject < 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 24 hours plus the additional 24 hours for a total of 48 hours.
		RESALE /UNE – 2 Wire Digital, 2 Wire xDSL	% On Time LSR Reject < 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 72 hours plus the additional 24 hours for a total of 96 hours.
		RESALE /UNE - Specials	% On Time LSR Reject < 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 48 hours plus the additional 24 hours for a total of 72 hours.
	OR-2-10	RESALE - POTS, 2 Wire Digital, 2 Wire xDSL, Specials UNE - Loop, Platform, 2 Wire Digital, 2 Wire xDSL, Specials	% On Time LSR Reject >/= 6 Lines – Fax	Verizon disagrees with this finding. The guidelines state that for faxed or mailed orders an additional 24 hours should be added to the interval. The interval for the faxed order is the standard interval of 72 hours plus the additional 24 hours for a total of 96 hours.

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Table 7: Metric calculations in the Carrier-to-Carrier Guidelines that are inconsistent with the metric definitions in those Guidelines.

Domain	Metric	Product	Metric Description	Issue
PO	PO-4-01	Change Mgmt. Notices/ Confirm.	% Change Management Notices and Change Management Confirmations Sent On-Time – Total (Change Management Notices and Confirmations Combined; Types 1-5 Combined)	The metric description in the C2C Guidelines implies that values for change management notices and change management confirmations are to be reported separately. However, the way the formula for the calculation is written suggests that they be combined.
	PO-4-02	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 1 to 7 days.	The metric description in the C2C Guidelines implies that values for change management notices and change management confirmations are to be reported separately. However, the way the formula for the calculation is written suggests that they be combined.
	PO-4-03	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 8 or more days.	The metric description in the C2C Guidelines implies that values for change management notices and change management confirmations are to be reported separately. However, the way the formula for the calculation is written suggests that they be combined.

Domain	Metric	Product	Metric Description	Issue
PO	PO-4-01	Change Mgmt. Notices/ Confirm.	% Change Management Notices and Change Management Confirmations Sent On-Time – Total (Change Management Notices and Confirmations Combined; Types 1-5 Combined)	The Guidelines clearly state that this metric is to be reported as a combination of Change Management Notices and Change Management Confirmations.
	PO-4-02	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 1 to 7 days.	The Guidelines clearly state that this metric is to be reported as a combination of Change Management Notices and Change Management Confirmations.

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Domain	Metric	Product	Metric Description	Issue
	PO-4-03	Change Mgmt. Notices/ Confirm.	Change Management Notices and Change Management Confirmations – Delay 8 or more days.	The Guidelines clearly state that this metric is to be reported as a combination of Change Management Notices and Change Management Confirmations.

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Table 8: Metric descriptions in the Carrier-to-Carrier Guidelines that are inconsistent with metric titles in those Guidelines.

Domain	Metric	Product	Metric Description	Issue
BI	BI-3-01	CRIS	% Billing Adjustments – Including Charges Adjusted Due to Billing Errors Resulting from Order Activity Post Completion Discrepancies.	The metric definition describes a billing *error* measurement, not billing *accuracy*.
BI	BI-3-03	CRIS	% Billing Adjustments – Excluding Charges Adjusted Due to Billing Errors Resulting from Order Activity Post Completion Discrepancies.	The metric definition describes a billing *error* measurement, not billing *accuracy*.

Domain	Metric	Product	Metric Description	
BI	BI-3-01	CRIS	% Billing Adjustments – Including Charges Adjusted Due to Billing Errors Resulting from Order Activity Post Completion Discrepancies.	The Guideline and title for this metrics was developed in NY and ordered by the NY PSC. PA and NJ have adopted it. The commissions in all three states, all participating CLECS, and other interested parties have reviewed the Guideline. VZ does not have sole authority to arbitrarily change the titles.
BI	BI-3-03	CRIS	% Billing Adjustments – Excluding Charges Adjusted Due to Billing Errors Resulting from Order Activity Post Completion Discrepancies.	The Guideline and title for this metrics was developed in PA as an addition to the BI 3-01 metric from NY. NJ has adopted it. The commissions in both states, all participating CLECS, and other interested parties have reviewed the Guideline. VZ does not have sole authority to arbitrarily change the titles.

Assessment

To the extent that Verizon does not populate its reports in accordance with the NJ Carrier-to-Carrier Guidelines (May 2000), Verizon is not compliant with decisions of the NJ BPU. Additionally, with these reporting discrepancies CLECs cannot verify that they are being provided with the level of service required by the NJ Carrier-to-Carrier Guidelines. The inconsistencies and inaccuracies of the metric guidelines and carrier-to-carrier reports could create unreliable metric results for the CLECs.

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